

REMARKS

Claim 23 has been cancelled. Claim 19 has been amended. Claims 1-22 and 24-37 remain in the application. In view of the following remarks, Application respectfully requests a Notice of Allowability be issued.

§101 Rejections

Claims 19 and 25-28 are rejected under 35 U.S.C. §101 as being directed to non-statutory subject matter.

Regarding **claims 25-28**, the Office's only argument is that these claims "are not limited to embodiments which fall within the statutory category [see paragraph 0073, carrier waves]". Applicant respectfully disagrees with the Office's argument and submits that claims 25-28 are directed to "[o]ne or computer-readable media having stored thereon a computer program", as claimed. Applicant notes that it was able to identify hundreds of issued U.S. patents directed to this statutory subject matter – many having a patent date as recently as July 18, 2006 (for example, consider U.S. Patent Numbers: 7,080,262, 7,080,249, 7,080,232, 7,080,039, 7,079,546).

Furthermore, regardless of the specific language of claims 25-28, when determining whether they are directed to statutory subject matter, *the pertinent question is not which category they are directed to*, but rather, their practical utility. Indeed, as AT&T makes clear, if an abstract idea is taken out of the abstract and employed in some type of process that achieves a "new and useful end", the process *is patentable* subject matter, even if the idea by itself would not be. (AT&T at 1357). Thus, the relevant inquiry under § 101 becomes -- Is the idea being applied to achieve a useful end? (Id.) If so, then the § 101 threshold is

1 satisfied. (*Id.*). In this regard, Applicant notes that in assessing the claims at
2 issue, both the claims themselves and the specification are relevant. For instance,
3 the court in *AT&T* looked to the *specification* to determine whether the claimed
4 process produced a useful, concrete, tangible result. (*Id.*). Applicant submits that
5 the practical utility of these claims is clearly evident from their language and from
6 the subject specification.

7 Finally, Applicant reminds the Office that, as its own guidelines clearly
8 indicate, “[t]he burden is on the USPTO to set forth a prima facie case of
9 unpatentability. Therefore if the examiner determines that it is more likely than
10 not that the claimed subject matter falls outside all of the statutory categories, the
11 examiner *must provide an explanation.*” (see Interim Guidelines for Examination
12 of Patent Applications for Patent Subject Matter Eligibility, page 16). Here, the
13 Office has not met that burden because it has not provided any explanation at all
14 other than to site to Paragraph [0073] of the subject application – which does not
15 even include claims 25-28.

16 In view of the above discussion, the Office has failed to show that claims
17 25-28 are directed to non-statutory subject matter under § 101. Accordingly, for at
18 least this reason, these claims are allowable.

19 Regarding **claim 19**, the Office argues that the claim is directed to non-
20 statutory subject matter because “[t]he system appears to be reasonably interpreted
21 by one of ordinary skill in light of the disclosure as software, *such that the system*
22 *is software per se.*” Applicant respectfully disagrees with the Office’s argument
23 and submits that the Office has not met its burden of setting a prima facie case of
24 unpatentability by providing an adequate explanation. (see above).

25 Nevertheless, as best as Applicant can discern, the Office appears to be

1 arguing that claim 19 does not produce a “tangible result” because it is not tied to
2 a machine or apparatus – and is instead “software per se”. Applicant respectfully
3 disagrees with the Office’s argument and reminds the Office that, as noted above,
4 AT&T clarifies that if an abstract idea is taken out of the abstract and employed in
5 some type of process that achieves a “*new and useful end*”, the process *is*
6 *patentable* subject matter, even if the idea by itself would not be. What’s more,
7 even the Office’s own guidelines clearly indicate that producing a tangible result
8 does not require that a claim be tied to a particular machine/ apparatus or operate
9 to change articles/materials to a different state or thing. (see “Tangible Result”,
10 found on pages 21-22 of the Interim Guidelines for Examination of Patent
11 Applications for Patent Subject Matter Eligibility).

12 Here, there is no doubt claim 19 produces a “*new and useful end*”. By
13 way of example and not limitation, Applicant notes that this claim recites “a
14 system” which includes “a translation module ... wherein the translation module
15 further modifies any internal links using data contained in the link translation table
16 and generates the requested web page data, including the modified internal links,
17 for communication to a source of the internal web page request.” Furthermore, the
18 subject application is replete with excerpts discussing the utility of a system, as
19 claimed. By way of example and not limitation, Applicant directs the Office’s
20 attention to Paragraphs [0026] through [0035] of the subject application.

21 In view of the above discussion, the Office has failed to show that claim 19
22 is directed to non-statutory subject matter under § 101. Accordingly, for at least
23 this reason, this claim is allowable.
24
25

1 **§102 and §103 Rejections**

2 Claims 19-21 and 23 are rejected under 35 U.S.C. §102(e) over U.S. Patent
3 No. 6,732,105 to Watson Jr. et al. (hereinafter "Watson").

4 Claims 1-9, 11, 12-12, 17-18, 25-27, and 29-37 stand rejected under 35
5 U.S.C. §103(a) as being obvious over U.S. Patent Application Publication No.
6 2004/0111491 to Raja (hereinafter "Raja") in view of Watson.

7 Claim 22 stands rejected under 35 U.S.C. §103(a) as being obvious over
8 Watson in view of U.S. Patent No. 5,937,404 to Csaszar et al. (hereinafter
9 "Csaszar").

10 Claim 24 stands rejected under 35 U.S.C. §103(a) as being obvious over
11 Watson in view of U.S. Patent No. 6,397,259 to Lincke et al. (hereinafter
12 "Lincke").

13 Claims 10 and 16 stand rejected under 35 U.S.C. §103(a) as being obvious
14 over Raja in view of Watson and Csaszar.

15 Claims 14, 15 and 28 stand rejected under 35 U.S.C. §103(a) as being
16 obvious over Raja in view of Watson and Lincke.

17
18 **The Rejections**

19 **Claim 1** recites a method comprising:

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21
 - receiving a request for an internal web page from an external
 - 22 browser application;
 - identifying at least one internal link in the internal web page;
 - 23 • modifying the at least one internal link such that the internal link is
 - 24 accessible by the external browser application; and
 - 25 • communicating the requested web page, including the modified
 - internal link, to the external browser application.

1
2 In making out the rejection of this claim, the Office argues that Raja
3 discloses all the subject matter of this claim except “including the modified
4 internal link, to the external browser application”. The Office then argues Watson
5 discloses this subject matter and reasons that one would have been motivated to
6 modify Raja with Watson “in order to provide a more secure method of accessing
7 intranet information.”

8 Applicant respectfully disagrees with the Office’s combination and its
9 stated motivation to combine these references. Specifically, Applicant fails to see
10 how modifying Raja by “including the modified internal link, to the external
11 browser application” would result in providing “a more secure method of
12 accessing intranet information”. *This result appears to be completely unrelated*
13 *to the modification* proposed by the Office. Furthermore, any motivation to make
14 the proposed combination seems even more remote considering *Raja already*
15 *teaches “a more secure method”* by using a proxy reverse server to prevent direct
16 access by web servers. (e.g., see Raja, Paragraphs [0005] – [0007]). As such, the
17 Office’s stated motivation suggests a result that would not occur and *fails to*
18 *explain why one would be motivated* to make the proposed modification.
19 Furthermore, it is too general because it could cover almost *any* alteration
20 contemplated of Raja (e.g. password authentication, additional firewalls, data
21 encryption, etc.).

22 Additionally, modifying Raja with the teachings of Watson would
23 *impermissibly render Raja unsatisfactory for its intended purpose*. (see MPEP
24 2143.01). Specifically, Raja is directed toward shifting computational overhead
25 from a reverse proxy server to a client. (see Abstract). In contrast, Column 10 of

1 Watson teaches changing a link to specify a keyword(s) and then associating
2 various keywords with designated pathways. This would shift more
3 computational overhead back to the reverse proxy server in Raja. Furthermore,
4 such a modification would clearly change the very principle of operation of the
5 reverse proxy server. (e.g., compare Fig. 2 of Raja with Fig. 9 of Watson).

6 In view of the above discussion, the Office has not established a *prima*
7 *facie* case of obviousness. Accordingly, for at least this reason, Applicant
8 traverses this rejection and submits that this claim is allowable.

9 **Claims 2-11** depend from claim 1 and are allowable as depending from an
10 allowable base claim. These claims are also allowable for their own recited
11 features which, in combination with those recited in claim 1, are neither disclosed
12 nor suggested in the references of record, either singly or in combination with one
13 another. In addition, given the allowability of these claims, the rejection of claim
14 10 over the further combination with Csaszar is not seen to add anything of
15 significance.

16 **Claim 12** recites a method comprising:

- 17
- 18 • receiving a request for an internal web page from an external source;
 - 19 • identifying link information contained in the request for an internal
20 web page;
 - 21 • storing the identified link information in a link translation table;
 - 22 • retrieving the internal web page;
 - 23 • translating any internal links in the internal web page such that the
24 internal links are accessible by the external source; and
 - 25 • communicating the internal web page, including the translated
internal links, to the external source.

24 In making out the rejection of this claim, the Office argues that Raja
25 discloses all the subject matter of this claim except “storing the identified link

1 information in a link translation table” and “including the translated internal links,
2 to the external source”. The Office then argues Watson discloses this subject
3 matter and reasons that one would have been motivated to modify Raja with
4 Watson “in order to provide a more secure method of accessing intranet
5 information. And further provides access for authenticated devices.”

6 Applicant respectfully disagrees with the Office’s combination and its
7 stated motivation to combine these references. Specifically, as noted above,
8 Applicant fails to see how modifying Raja by “including the translated internal
9 links to the external source” would result in providing “a more secure method of
10 accessing intranet information”. *This result appears to be completely unrelated*
11 *to the modification* proposed by the Office. Furthermore, *Raja already teaches*
12 *“a more secure method”* by using a proxy reverse server to prevent direct access
13 by web servers. As such, the Office’s stated motivation suggests a result that
14 would not occur and *fails to explain why one would be motivated* to make the
15 proposed modification. Furthermore, it is too general because it could cover
16 almost *any* alteration contemplated of Raja (e.g. password authentication,
17 additional firewalls, data encryption, etc.).

18 In addition, with respect to providing “access for authenticated devices”,
19 Raja already teaches this functionality. (e.g., see Raja, Paragraphs [0009] –
20 [0016]). Hence, it remains unclear why one would have been motivated to make
21 the modification proposed by the Office.

22 Finally, as discussed above, modifying Raja with the teachings Watson
23 would *impermissibly render Raja unsatisfactory for its intended purpose and*
24 *change its principle of operation* . (see MPEP 2143.01).

25 In view of the above discussion, the Office has not established a *prima*

1 *facie* case of obviousness. Accordingly, for at least this reason, Applicant
2 traverses this rejection and submits that this claim is allowable.

3 **Claims 13-18** depend from claim 12 and are allowable as depending from
4 an allowable base claim. These claims are also allowable for their own recited
5 features which, in combination with those recited in claim 12, are neither disclosed
6 nor suggested in the references of record, either singly or in combination with one
7 another. In addition, given the allowability of these claims, the rejection of claim
8 16 over the further combination with Csaszar and claims 14 and 15 over the
9 further combination with Watson and Lincke is not seen to add anything of
10 significance.

11 **Claim 19**, as amended, recites a system comprising [added language in
12 **bold italics**]:

- 13
- 14 • a link translation table, *wherein the link translation table contains*
15 *mappings of portions of links between internal links and external*
16 *links, wherein internal links are accessible by an internal device*
coupled to an internal network and external links are accessible by
an external device coupled to an external network; and
 - 17 • a translation module coupled to the link translation table, wherein
18 the translation module is to receive a request for an internal web
19 page and to identify any internal links in the requested internal web
20 page, wherein the translation module further modifies any internal
21 links using data contained in the link translation table and generates
22 the requested web page data, including the modified internal links,
23 for communication to a source of the internal web page request.

24 In making out the rejection of this claim, the Office argues that Raja
25 discloses all the subject matter of this claim. In this regard, the Office relies on the
keyword lookup table of Watson as disclosing “a link translation table, wherein
the link translation table contains mappings of portions of links between internal

1 links and external links”, as claimed. (see Office Action, page 5).

2 Applicant respectfully disagrees with the Office’s argument and traverses
3 this rejection. Specifically, Applicant submits that the keyword lookup table of
4 Watson fails to disclose or suggest “a translation table ...wherein the link
5 translation table contains mappings of portions of links between internal links *and*
6 *external links...*”, as claimed. (emphasis added). Instead, this table “contains
7 keywords and corresponding pathways for links and applications that reside on the
8 *intranet* servers.” (Watson, Column 10, lines 43-45) (emphasis added). Missing
9 from the table is any reference to an external link. To assist the Office in
10 appreciating this patentable distinction, Applicant first directs the Office’s
11 attention to Fig. 4 of the subject application, which is but one example of subject
12 matter embodying the spirit of “a link translation table”, as claimed. Applicant
13 notes that by referencing this figure, Applicant is in no way limiting the scope of
14 this claim. Fig. 4 illustrates an example link translation table 400 which includes a
15 first column 402 associated with an internal link (or portion of a link) *and a*
16 *second column associated with an external link* (or portion of a link). Next,
17 Applicant directs the Office’s attention to Fig. 10 of Watson, which depicts, in
18 stark contrast to Fig. 4 above, a keyword lookup containing a keyword entry and
19 corresponding path *only to the server on the intranet* (also see Watson, Column 9,
20 lines 22-23 and Column 10, lines 43-45). Even a cursory glance at these figures is
21 sufficient to show that the keyword lookup table of Watson is very different from
22 the link translation table of this claim.

23 Accordingly, Watson fails to disclose or suggest all of the subject matter of
24 this claim and this claim is therefore allowable.

25 **Claims 20-22 and 24** depend from claim 19 and are allowable as

1 depending from an allowable base claim. These claims are also allowable for their
2 own recited features which, in combination with those recited in claim 19, are
3 neither disclosed nor suggested in the reference of record. In addition, given the
4 allowability of these claims, the rejection of claim 22 as being obvious over
5 Watson in view of Csaszar, and claim 24 as being obvious over Watson Lincke, is
6 not seen to add anything of significance.

7 **Claim 25** recites one or more computer-readable media having stored
8 thereon a computer program that, when executed by one or more processors,
9 causes the one or more processors to:

- 10 • receive a request for an internal web page via a public network;
- 11 • retrieve the requested internal web page;
- 12 • determine whether the internal web page contains any internal links;
- 13 • if the internal web page contains at least one internal link:
 - 14 ○ modify the at least one internal link such that the internal link is
15 accessible via the public network; and
 - 16 ○ generating data representing the requested internal web page,
17 wherein the generated data includes the modified internal link.

18 In making out the rejection of this claim, the Office argues that Raja
19 discloses all the subject matter of this claim except to “determine whether the
20 internal web page contains any internal links”. The Office then argues Watson
21 discloses this subject matter and reasons that one would have been motivated to
22 modify Raja with Watson “to provide access to intranet information”.

23 Applicant respectfully disagrees with the Office’s combination and its
24 stated motivation to combine these references. Specifically, the Office’s stated
25 motivation is not relevant because Raja already provides access to intranet
information. In fact, Raja itself states “[t]he present invention relates to reverse

1 proxy servers...” (Raja, Paragraph [0002]) and “[r]everse proxy servers generally
2 refer to devices at a logical edge of an internet ...and enable clients ...on the
3 internet to access web servers located within the intranet.” (Raja, Paragraph
4 [0004]). Therefore, it remains a mystery why one would be motivated to modify
5 Raja in such a way merely to achieve functionality that already exists.

6 Accordingly, the Office has not established a *prima facie* case of
7 obviousness. For at least this reason, Applicant traverses this rejection and
8 submits that this claim is allowable.

9 **Claims 26-28** depend from claim 25 and are allowable as depending from
10 an allowable base claim. These claims are also allowable for their own recited
11 features which, in combination with those recited in claim 25, are neither disclosed
12 nor suggested in the references of record. In addition, given the allowability of
13 these claims, the rejection of claim 28 as being obvious over Raja in view of
14 Watson and Lincke is not seen to add anything of significance.

15 **Claim 29** recites an apparatus comprising:

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- 17 • means for receiving a request for a web page associated with an
internal network; and
 - 18 • means for translating internal links contained in the web page,
19 wherein the internal links are accessible via the internal network, and
20 wherein the means for translating translates any internal links
contained in the web page into external links that are accessible via
an external network.
- 21

22 In making out the rejection of this claim, the Office argues that Raja
23 discloses a “means for receiving a request”, as claimed. The Office also argues
24 that Watson discloses “scanning a web page for links. Wherein the proxy server
25 decides whether the links point to a server on the intranet or internet.” The Office

1 then reasons that it would have been obvious to modify Raja with the teachings of
2 Watson "to provide access to intranet information".

3 Applicant respectfully disagrees with the Office's combination and its
4 stated motivation to combine these references. First, this claim does not explicitly
5 recite "scanning a web page for links. Wherein the proxy server decides whether
6 the links point to a server on the intranet or internet." Accordingly, the Office's
7 rejection does not appear to address this claim's subject matter.

8 Second, as noted above with respect to claim 25, the Office's stated
9 motivation is not relevant because Raja already provides access to intranet
10 information.

11 Accordingly, the Office has not established a *prima facie* case of
12 obviousness. For at least this reason, Applicant traverses this rejection and
13 submits that this claim is allowable.

14 **Claims 30-37** depend from claim 29 and are allowable as depending from
15 an allowable base claim. These claims are also allowable for their own recited
16 features which, in combination with those recited in claim 29, are neither disclosed
17 nor suggested in the references of record.

1 **Conclusion**

2 All of the claims are in condition for allowance. Accordingly, Applicant
3 requests a Notice of Allowability be issued forthwith. If the Office's next
4 anticipated action is to be anything other than issuance of a Notice of Allowability,
5 Applicant respectfully requests a telephone call for the purpose of scheduling an
6 interview.

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8 Respectfully Submitted,

9
10 Dated: 09/01/2006

11 By: _____

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